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**From:** MARYKAY VOYTILLA  
**To:** RTPMAINHUB.Internet."jstefano@ch2m.com"  
**Subject:** Comments on KEECO draft memo

Jim, 8/5/99

As we discussed on the telephone earlier today, here are my comments on the August 3, 1999 draft memorandum "Review of KEECO Submittals."

1. Please review the June 16, 1997 technical memorandum "Bunker Hill - In-Mine Water Treatment Proposal," prepared by CH2M Hill (I faxed to you earlier) and give me your thoughts on whether we should attach this document to the KEECO review memo (i.e., does the new KEECO data address any of the issues raised by Hill in the Interpretations and Conclusions section of the 6/16/97 tech memo?).

2. Somewhere in the KEECO review memo refer the reader to the "original" discussion of the KEECO process in the July 28, 1999 AMD Treatment Presumptive Remedy tech memo (PR tech memo), and address in the KEECO review memo the issues raised in PR tech memo regarding the treatment process:

- Summarize what we think about the ability of the KEECO process to meet the treatment levels.
- Address the proprietariness of the KEECO process and what that likely means regarding number of suppliers available and cost competitiveness as compared to more conventional processes and chemical products.
- Address whether there is any information to suggest that the KEECO process is or would be more effective than more conventional processes (with known costs, etc.).
- Address that we think that the process would likely create more sludge and explain why we think that is so. Also, address issue regarding KEECO sludge likely pass TCLP, but Bunker does so already.
- Note in the text the extent to which this technology has been tried at full scale (i.e., how innovative or untried is this method as compared to more conventional measures).
- Include a summary paragraph or note on whether there are any clear potential advantages to this process based on the issues above.
- Include a summary paragraph or note on whether, based on the above, Hill recommends going forward with any treatability studies on this process.

3. Remove the last sentence in the Summary section of the KEECO review memo starting with "additional testing."

Thanks,  
Mary Kay

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